

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**JOHN AND CINDY SKOGEN,**  
*Plaintiffs,*

**v.**

**RFJ AUTO GROUP, INC. EMPLOYEE  
BENEFIT PLAN, RFJ AUTO GROUP,  
INC., and GROUP & PENSION  
ADMINISTRATORS, INC.,**  
*Defendants.*

**Case No. 4:19-cv-585**

**JOINT MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY ORDER**

Plaintiffs, John and Cindy Skogen (collectively, “Skogens”), Defendant, Group & Pension Administrators, Inc. (“GPA”), Defendant RFJ Auto Group, Inc. Employee Benefit Plan (“The Plan”), and Defendant RFJ Auto Group, Inc. (“RFJ”), each to be referred to herein as “Party” and collectively as “Parties,” move for the entry of the Stipulated Confidentiality Order as follows:

1. The parties wish to provide for confidentiality as to certain documents which may be produced in discovery, including written discovery, depositions, and/or materials subpoenaed from third parties.

2. The parties’ counsel have conferred regarding issues of confidentiality and the form of a proposed Stipulated Confidentiality Order. The parties have stipulated to the entry of a Confidentiality Order in the form attached hereto.

3. The Confidentiality Order serves to protect confidential information which may be disclosed in this matter. The parties below agree that the terms of the Confidentiality Order shall govern upon the filing of this Motion.

4. Furthermore, the Parties believe that in the course of the above-captioned action, confidential information, including medical information protected by state law and federal law, including the Health Insurance Portability and Accountability Act (“HIPAA”), will necessarily be disclosed.

5. The Parties further believe that entry of a protective order pursuant to Federal Rules of Civil Procedure Rule 26 is necessary for the prosecution and defense of this action given the confidential medical and non-medical information at issue.

6. It is respectfully requested that the Court sign and enter the Confidentiality Order in the form attached hereto pursuant to Fed. R. Civ. P. Rule 26 in order to protect confidential and HIPAA-protected information.

Respectfully submitted this 16th day of July, 2020.

**AGREED AND APPROVED:**

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Inc. Employee Benefit Plan and RFJ Auto  
Group, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 16th day of July, 2020, a true and correct copy of the above and foregoing **JOINT MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY ORDER** was served via CM/ECF upon all counsel of record in accordance with the Federal Rules of Civil Procedure as follows:

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